

From: [Harrington, Dwayne](#)
To: [Pagnini Robert](#)
Cc: charger22@aol.com; [Tonetta Richard](#)
Subject: Re: EPA update
Date: Sunday, July 10, 2016 11:07:21 AM

Apparently not. I'll discuss again with refrigeration contractors though.

Sent from my iPhone

> On Jul 10, 2016, at 11:02 AM, Pagnini Robert <rpagnini@vinelandcity.org> wrote:

>

> Received and noted. I see the issues with the relief valves.

> Would it be possible to build a hood type system that could encapsulate the relief valves without compromising the valves or piping. Then direct the encapsulating hood device to discharge to the scrubber in the event of a relief valve failure?

> This would have to be designed to be free standing with its own supports as to not put any weight or strain on the relief valves or piping.

>

> Sent from my Windows Phone

>

> From: charger22@aol.com<<mailto:charger22@aol.com>>

> Sent: 7/10/2016 9:40

> To: Tonetta Richard<<mailto:rtonetta@vinelandcity.org>>; Pagnini Robert<<mailto:rpagnini@vinelandcity.org>>

> Subject: EPA update

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> Here is the EPA update from yesterday,, Larry

> Update for 7/9/16:

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> Two of the four relief discharges have been secured and routed to discharge to the scrubber, however, two pressure relief valves were not able to be secured. The state of deterioration of the vapor pressure relief valves was found to be so severe that a secure connection is not possible. The two direct-discharge liquified ammonia direct-discharge vents were successfully attached to the scrubber.

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> After a review of the refrigeration system, EPA's refrigeration contractor determined that the two vapor relief valves could not be isolated to be replaced with new valves even temporarily

> because the overall refrigeration system is so deteriorated as to be inoperable, and even under the best conditions the attempted operation would nevertheless result in a significant release (greater than 100 lbs) of residual ammonia in the condensers, which would be an unacceptable risk to the technicians performing the work, not to mention the surrounding community. In addition, even if the valves could be safely removed, should their connecting screw-threads to the condensers be similarly deteriorated, which is highly likely, they could not be replaced and that would essentially shut the system down permanently.

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> The refrigeration contractor also stated that, due to the design and deteriorated state and resulting inoperability of the system, a failure of one of the relief valves would ultimately result in the release from the valve of the entire contents of the ammonia in the system (currently roughly estimated at ten to twelve thousand pounds), which could not be secured because of the state of the system, and the resulting release could possibly last up to two weeks (10,000-12,000 lbs ammonia at 119 psi through a 1/2 vent line).

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> The facility owner told EPA that our and our contractors' activities on site were starting to make him nervous.

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> The relocation of the seven residences adjacent to the facility has been extended through Tuesday, and possibly (probably) beyond, pending further assessment and developments. PAD is preparing an updated fact sheet.

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> The VFD has lifted the shelter in place standby advisory for neighborhood, however, the emergency notifications

and instructions for the public in the event of a release remain intact. IMAAC release projections will be revised for current worst-case conditions.

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> EPA refrigeration system and structural engineering contractors will be on site on Monday 7/11/16 to assess the refrigeration system and the building to determine what actions, including immediate emergency actions, are required to at least stabilize the situation, including what options are available to address the non-secured pressure relief valves on the condensers.

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> RST continues 24-hr air monitoring.

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